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July 14, 2017

VIA CM/ECF

AUSA Alicyn L. Cooley
AUSA Lauren H. Elbert
AUSA Sarah Evans
United States Attorney's Office
Eastern District of New York
271 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Mark Nordlicht, et al., No. 1:16-cr-00640-DLI

Dear AUSAs Cooley, Elbert and Evans:

We write on behalf of defendant David Levy in connection with the above-captioned action. As you know, the Court recently granted the Government's motion to stay *Securities and Exchange Commission v. Platinum Management (NY) LLC, et al.*, No. 1:16-cv-06848-DLI-VMS, based in part on the Government's representation that "it will produce to defendants all materials it has received from the SEC allowing defendants to prepare for the civil case during the pendency of the criminal case." See Memorandum & Order dated July 7, 2017, at 10 (Dkt. No. 217). Accordingly, please confirm that the Government will produce forthwith all materials it obtains from the SEC, including, but not limited to, all transcripts, memoranda, notes and files concerning any audit or interview conducted by the SEC (whether by the Enforcement Division, the Office of Compliance, or any other office or division of the SEC).

Respectfully submitted,

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

s/ Morris J. Fodeman
Morris J. Fodeman
Michael S. Sommer

cc: All Counsel of Record (via CM/ECF)
Neil Jacobson (via email)
Sanjay Wadhwa (via email)
Kevin McGrath (via email)
Jess Velona (via email)

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Danielle Sallah (via email)
Andrew M. Calamari (via email)
Adam Grace (via email)